

# EXHIBIT 3

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*By email*

July 25, 2018

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**RE: First Supplemental Request for Information  
*Barnhardt v. Meridian Mun. Separate Sch. Dist., et. al.*, C.A. No. 4:65-cv-01300 HTW-LRA-1300(E) (S.D. Miss.)**

Dear Counsel:

On behalf of the Private Plaintiffs, the NAACP Legal Defense and Educational Fund, Inc. (“LDF”) writes to submit the first supplemental information requests regarding Meridian Municipal Separate School District’s (“District”) compliance with its desegregation obligations.

1. Please provide the criteria, if any, teachers at Poplar Springs use in selecting homeroom representatives for Student Council.
2. Please provide the criteria, if any, teachers at Poplar Springs use in selecting students to receive Science and/or Reading Fair awards.
3. Please provide a narrative statement of what, if any, prerequisites there are (*e.g.*, monetary dues, applications, audition, teacher selection) for the extracurricular activities at each school, including (but not limited to) yearbook class superlatives (*e.g.*, “most likely to succeed”), homecoming or prom courts, honor societies, clubs or teams, or awards.
4. Please provide a statement of what criteria, if any (*e.g.*, disciplinary record or GPA level), will result in a student’s suspension or removal from an extracurricular activity.
5. Please provide the name of the gifted teachers and each school to which they are assigned for SY 2015-2016 through present. This clarification is necessary because the document produced by the District titled “Response to Nos. 4&7-9” appears to be inconsistent with “DOJ Request II Student Assignment-D, E, F.”
6. Please provide the percentage of time each gifted teacher identified in request number 5 is assigned to each of their assigned schools.
7. Describe the gifted program at each school and services, including enrichment services, provided at each school. Describe how the gifted programs differ at any school, if applicable.



8. Identify whether there are any unique course offerings among any of the elementary schools.
9. Please provide faculty retention data at each school for SY 2015-2016 through present, including the teacher's race.
10. From the February 2018 Arrests & Citations report, please provide the race of the students who the District's law enforcement officers arrested and/or issued citations to, specifically: B.W. 11-30-2017; D.H. 11-14-2017; J.B. 10-4-2017; J.M. 11-07-2017; J.T. 10-6-2017; and K.J. 10-3-2017.
11. Please provide the graduation rate, disaggregated by race, from SY 2014-15 through SY 2016-2017.
12. Please provide the dropout rate, disaggregated by race, from SY 2013-14 through SY 2017-2018.
13. Please provide the AP exam results (passing or not passing), disaggregated by race, from SY 2015-16 to SY 2017-18.
14. Please provide the race of employees who engaged in the recruitment of instructional staff for the 2017-18 and 2018-19 school years.
15. Please confirm that in SY 2015-16, Magnolia Middle School employed 13 teachers whose race was categorized as "other."
16. Please provide a spreadsheet with the following information, by school, for each teacher employed by the District for the 2016-17 and 2017-18 school years: race, gender, date of hire by district, date teacher began at the school, and whether the teacher was hired on emergency status. Plaintiffs are unable to ascertain this information from the data provided because certain data provided is either not disaggregated or contradicts other data provided. For example, there are discrepancies between the document titled "DOJ Request III Administrators, Faculty, and Staff – A (Certified) (Race&Gender)" and "LDF Request II.B – Supplement." Further, in "DOJ Request III Administrators, Faculty, and Staff – A (Certified) (Race&Gender)," certified staff are not disaggregated by position (*e.g.*, certified teacher, certified nurse, etc.) as previously provided by the District.



Thank you again for your cooperation and assistance. Please send your response via email to [nmerle@naacpldf.org](mailto:nmerle@naacpldf.org), [ahoag@naacpldf.org](mailto:ahoag@naacpldf.org), and [kjohnson@naacpldf.org](mailto:kjohnson@naacpldf.org). Should you have any questions please contact us at (212) 965-2200.

Sincerely yours,

A handwritten signature in dark ink that reads "Natasha Merle". The signature is fluid and cursive, with the first name "Natasha" and last name "Merle" clearly distinguishable.

Natasha C. Merle  
NAACP Legal Defense and  
Educational Fund, Inc.

Cc: Natane Singleton  
Aria Vaughan  
U.S. Department of Justice  
Civil Rights Division  
Education Opportunities Section